

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

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| IN RE: | § | CASE NO. 22-20164 |
| VERONICA SAENZ | § | CHAPTER 13 |
| DEBTOR(S) | § | |

NOTICE OF HEARING ON RELIEF FROM STAY

On 18 day of July, 2022, a motion was filed, seeking relief from the automatic stay of 11 U.S.C. § 362. The Court has set the preliminary hearing on the motion for:

Hearing Date: August 12, 2022

Hearing Time: 9:00 A.M.

Courtroom/Address: The initial hearing will be telephonic. Parties in interest must consult Judge Isgur's procedures (available on the Court's web site) for dialing instructions.

If you object to the filing of the stay, no later than five (5) working days before the hearing you must:

1. File with the Clerk an affidavit stating that:
 - a) You have conferred with the Movant in a good faith effort to reach an agreement, with the dates and times of the conferences,
 - b) The efforts were unsuccessful, and
 - c) A hearing is required.
2. File with the Clerk your written answer opposing the motion; include:
 - a) The particular grounds for the opposition under Federal Rules 8(b) and 11;
 - b) The identity of your interest in the property;
 - c) The provable value of the property and equity after deduction of all encumbrances;
 - d) Attach copies of your affidavit of conferences and the motion to your answer.
3. Serve a copy of your written answer on the Movant at:

HUGHES, WATTERS, & ASKANASE, LLP
Attention: Michael Weems
1201 Louisiana 28th Floor
Houston, Texas 77002-7354

To the Movant: A copy of your motion along with the location, date and time the hearing is set must be served within 24 hours. Proof of service including names of those served, date, and method of service shall be filed with the clerk. Service shall comply with BLR 4001(a).

DEFENSES; FORM OF DENIALS. *A party shall states in short and plain terms his defenses to each claim asserted and shall admit or deny the averments upon which the adverse party relies... Denials shall fairly meet the substance of the averments denied. When a pleader intends in good faith to deny only a party or a qualification of an averment, he shall specify as much of it as is true and material and shall deny only the remainder... [H]e may do so by general denial subject to... Rule 11*

**PROOF OF SERVICE:
MOTION FOR RELIEF FROM THE AUTOMATIC STAY OF AN ACT AGAINST
REAL PROPERTY OF 11 U.S.C. § 362**

FEDERAL RULE OF CIVIL PROCEDURE 8(b):

On behalf of Movant, I certify that I am more than 18 years of age, and I served a copy of the motion for relief from stay with the attached notice of hearing on this the 18 day of July, 2022 electronically or by first class, U.S. Mail, postage pre-paid to all creditors and parties in interest as shown below and on the attached mailing list:

DEBTOR
VERONICA SAENZ
525 POENISCH DR
CORPUS CHRISTI, TX 78412

DEBTORS' ATTORNEY
TIMOTHY D RAUB
RAUB LAW FIRM PC
814 LEOPARD
CORPUS CHRISTI, TX 78401

TRUSTEE
YVONNE V VALDEZ
CHAPTER 13 TRUSTEE
555 N CARANCAHUA SUITE 600
CORPUS CHRISTI, TX 78401

US TRUSTEE
606 N CARANCAHUA
CORPUS CHRISTI, TX 78401

CO-DEBTOR
DOMINIQUE D. LANE
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CORPUS CHRISTI, TX 78412

CLAYTON LOCKLEER EVERETT
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KATHRYN NICHOLE DAHLIN
CODILIS & MOODY PC
400 N. SAM HOUSTON PKWY. E., STE. 900A
HOUSTON, TX 77060

Respectfully submitted:



HUGHES, WATTERS & ASKANASE, L.L.P.

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